

1 DANIEL G. BOGDEN  
2 United States Attorney  
3 Nevada Bar No. 2137  
4 DANIEL D. HOLLINGSWORTH  
5 Assistant United States Attorney  
6 Nevada State Bar No. 1925  
7 Lloyd D. George United States Courthouse  
8 333 Las Vegas Boulevard South, Suite 5000  
9 Las Vegas, Nevada 89101  
10 Telephone: (702) 388-6336  
11 Facsimile: (702) 388-6787  
12 E-mail: Daniel.Hollingsworth@usdoj.gov  
13 Counsel for the United States of America

14  
15  
16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18  
19 UNITED STATES OF AMERICA, )  
20 Plaintiff, )  
21 v. ) 2:11-CR-453-PMP-(CWH)  
22 DAVID M. MARK , )  
23 Defendant. )

24  
25  
26 **UNITED STATES OF AMERICA'S MOTION TO EXTEND TIME TO RESPOND TO  
DEFENDANT DAVID MARK'S OBJECTION TO POST VERDICT ORDER OF FORFEITURE  
AND REQUEST FOR HEARING (ECF NO. 153)  
(Second Request)**

27  
28 The United States of America ("United States"), by and through Daniel G. Bogden, United States  
29 Attorney for the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney  
30 ("AUSA"), respectfully moves this Honorable Court for an Order extending the time for the United  
31 States to file a Response to Defendant David Mark's Objection To Post Verdict Order Of Forfeiture and  
32 Request for Hearing (ECF No. 153) pursuant to Fed. R. Crim. P. 45(b)(1) and LCR 45-1. The Response  
33 is currently due May 24, 2013. Order, ECF No. 154. The United States requests an extension of time to  
34 and including June 7, 2013. This is the second request for an extension of time. The grounds for  
35 extending the time are as follows.

1 Undersigned counsel has been filing required responses in both criminal and civil cases, has filed  
2 civil complaints, has not been able to meet all of the deadlines, and has had to request extensions of time  
3 on some of the numerous deadlines. Undersigned counsel cannot still meet all of the deadlines in these  
4 cases and needs an extension of time. Undersigned counsel also has a family matter to attend to on May  
5 24, 2013.

6 This past week undersigned counsel has called opposing counsel, Michael S. Fawer, and left  
7 phone message, has also called at different times of the day, and has never spoken with a live person.  
8 The voice message states a message can be left. These calls were to see whether Mr. Fawer would not  
9 oppose this extension of time and authorize the extension. The undersigned has not received a message  
10 from Mr. Fawer or his office.

11 This motion is not submitted solely for the purpose of delay or for any other improper purpose.

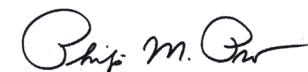
12 This Court should grant an extension of time to and including June 7, 2013, pursuant to Fed. R.  
13 Crim. P. 45(b)(1) and LCR 45-1, for the United States to file a Response to Defendant David Mark's  
14 Objection To Post Verdict Order Of Forfeiture and Request for Hearing (ECF No. 153).

15 DATED this 22nd day of May, 2013.

16 DANIEL G. BOGDEN  
17 United States Attorney

18 /s/Daniel D. Hollingsworth  
19 DANIEL D. HOLLINGSWORTH  
20 Assistant United States Attorney

21 IT IS SO ORDERED:

22   
23

24 

---

UNITED STATES DISTRICT JUDGE

25 DATED: May 23, 2013